

ESTTA Tracking number: **ESTTA710885**

Filing date: **11/25/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

| | |
|------------------------|---|
| Proceeding | 91223884 |
| Party | Defendant Carrot Creative, LLC |
| Correspondence Address | KIMBERLY B HERMAN SULLIVAN & WORCESTER LLP ONE POST OFFICE SQUARE SUITE 2100 BOSTON, MA 02109-2129 UNITED STATES lrobins@sandw.com, trademark@sandw.com, kherman@sandw.com, sdoug-laass@frosszelnick.com |
| Submission | Stipulated/Consent Motion to Extend |
| Filer's Name | Kimberly B. Herman |
| Filer's e-mail | kherman@sandw.com, lrobins@sandw.com, trademark@sandw.com, mpalmisciano@sandw.com |
| Signature | /Kimberly B. Herman/ |
| Date | 11/25/2015 |
| Attachments | Stipulation for Extension - 91223884 - 11-25-15(B1950621).PDF(166507 bytes) |

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

| | | |
|------------------------------|---|----------------------------------|
| DENTSU AEGIS NETWORK FRANCE, |) | |
| |) | |
| Opposer, |) | Opposition No. 91223884 |
| |) | |
| v. |) | Mark: CARROT CREATIVE |
| |) | |
| CARROT CREATIVE, LLC, |) | Application No. 86/415874 |
| |) | Filing Date: October 6, 2014 |
| Applicant. |) | Publication Date: March 24, 2015 |
| |) | |

**MOTION FOR AN EXTENSION OF DISCOVERY AND TRIAL PERIODS WITH
CONSENT**

The Discovery Period is currently set to open on November 26, 2015. Carrot Creative, LLC requests that such date be extended for 30 days, or until December 26, 2015, and that all subsequent dates be reset accordingly.

| Action | Proposed Deadline |
|---|--------------------|
| Initial Disclosures Due | January 25, 2016 |
| Expert Disclosures Due | May 24, 2016 |
| Discovery Closes | June 23, 2016 |
| Plaintiff's Pretrial Disclosures | August 7, 2016 |
| Plaintiff's 30-day Trial Period Ends | September 21, 2016 |
| Defendant's Pretrial Disclosures | October 6, 2016 |
| Defendant's 30-day Trial Period Ends | November 20, 2016 |
| Plaintiff's Rebuttal Disclosures | December 5, 2016 |
| Plaintiff's 15-day Rebuttal Period Ends | January 4, 2017 |

The grounds for this request are as follows:

The parties are engaged in settlement discussions.

Carrot Creative, LLC has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Carrot Creative, LLC has provided an e-mail address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

Respectfully Submitted,

CARROT CREATIVE, LLC

By its attorneys,

Dated: November 25, 2015

By: /Lawrence R. Robins/

Lawrence R. Robins

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CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing Motion for an Extension of Discovery and Trial Periods with Consent has been served upon counsel for the Opposer at its address of record by e-mail on this 25th day of November 2015:

Susan Upton Douglass
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/Lawrence R. Robins/
Lawrence R. Robins